IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

NUMERIC ANALYTICS, LLC

Civ. Act. No. 16-cv-00051-GAM

Plaintiff,

V.

ANN MCCABE, KURT SCHRON, ROBERT SAUNDERS, BERNADETTE SANCHEZ, and ELIZA CLEMENT

Defendants.

DECLARATION OF ELIZA CLEMENT IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS

I, Eliza Clement, make the following Declaration of my own free will and without duress, and based upon personal knowledge:

- 1. I am a Defendant in the above captioned action, which was filed in Pennsylvania state court and had been removed to federal court in Pennsylvania.
- 2. I am now and at all relevant times have been a resident of and citizen of the state of Virginia.
- 3. I was formerly employed by Numeric Analytics, LLC ("Numeric Analytics") from March 2015 until December 22, 2015. Throughout the course of my employment I worked onsite at Time Warner Cable in northern Virginia.
- 4. In connection with my employment with Numeric Analytics (before, during and after), I have never visited Pennsylvania.
- 5. I have never been to Pennsylvania for any business-related reason whatsoever.

- 6. I have never lived in Pennsylvania nor spent any significant period of time in Pennsylvania.
- 7. To the best of my knowledge, I have not been to Pennsylvania other than for visiting Hershey Park in July 2015 and a ski trip over six years ago.
- 8. I was in Virginia when I signed the agreement Numeric Analytics attaches to the Complaint.
- 9. Given these facts, and that I live, and worked for Numeric Analytics, in Virginia, I believe it is unfair that I should have to defend a lawsuit brought by Numeric Analytics in Pennsylvania.

THIS DECLARATION IS MADE IN ACCORDANCE WITH 28 U.S.C. SECTION 1746.

I DECLARE UNDER THE PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT. EXECUTED ON JANUARY 8, 2016

Eliza Clement

01/08/2016

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CERTIFICATE OF SERVICE

I hereby certify that on the date shown below, I caused a true and correct copy of the foregoing document, via hand delivery, upon the following person at the address shown:

Counsel for Plaintiff:

Eugene J. Malady, Esq. Eugene Malady, LLC 211-213 N. Olive St. Media, PA 19603

Daniel	P	O'Meara	